



COUNTY OF NASSAU
OFFICE OF THE COUNTY ATTORNEY

December 5, 2023

Via ECF

Honorable Gary R. Brown
United States District Court
100 Federal Plaza
Central Islip, New York 11722

Re: Frankie Valenti v. Ryder, et al. (19-CV-03990 (GRB)(LGD))

Your Honor:

This office represents defendants in the above referenced action. Together with Neil S. Torczyner, Esq., attorney for plaintiff Frankie Valenti ("plaintiff"), the parties respectfully submit the following proposed briefing schedule for defendants' renewed motion for summary judgment, and plaintiff's renewed cross-motion for summary judgment, both motions pursuant to Fed. R. Civ. P. 56. Previously, the parties' original motions were filed on ECF, however, by order filed October 20, 2023 Your Honor ordered that the motions be withdrawn, with leave to renew. Therefore, the parties now propose the following briefing schedule for their renewed motions:

February 8, 2024 – Defendants serve their motion upon plaintiff's attorney

March 14, 2024 – Plaintiff serves his cross-motion together with opposition to defendants' motion

March 28, 2024 – Defendants serve their opposition to plaintiff's cross-motion, together with their Reply in further support of their motion for summary judgment

April 11, 2024 – Plaintiff serves his Reply in further support of his cross-motion

April 18, 2024 - Defendants' fully briefed motion, and plaintiff's fully briefed cross-motion are filed on ECF, and courtesy copies will be sent to Chambers.

The parties therefore jointly and respectfully request that the Court approve and "so order" the foregoing briefing schedule. As always, the parties thank Your Honor for your attention and consideration in this matter.

Respectfully submitted,

/s/ Ralph J. Reissman
RALPH J. REISSMAN

cc: Neil S. Torczyner, Esq, Attorney for Plaintiff Deputy County Attorney